

## **Exhibit 52**

# **SCHOOL DISTRICT/LOCAL GOVERNMENT ENTITY PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO EXCLUDE TESTIMONY OF SCHOOL DISTRICT EXPERTS**

Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

**Affidavit of Kera Howard**

1. My name is Kera Howard and I make this declaration based on my personal knowledge.
2. I received a Bachelors in 2010 on December 18th from Morerhead State University and received a Master in Counseling P-12 on December 14<sup>th</sup> of 2013 from Morehead State University.
3. I have 8 years experience working in Pre-K-12 education.
4. I have been a school counselor at Breathitt High School since November 2016.
5. In my position as a school counselor, I address the mental and emotional health needs of students, address conflicts that arise between students, and provide guidance regarding student's academics.
6. Breathitt High School uses a database to track counseling time. However, this database only tracks counselors' direct and indirect hours without detailing the reasons students seek support.
7. Currently, addressing the effects of social media on students is the biggest challenge we address as school counselors in the Breathitt School District. Nearly every student who walks into our complex is dealing with an issue related to social media. Accordingly, a substantial amount of my work time, and the work time of my fellow counselors, is spent addressing the fallout of social media's negative impact on students.
8. In my experience, I have seen a growing problem of addictive, compulsive and problematic social media use among our students. We face a constant battle in separating students from their phones as students are unable to regulate or control their use of social media. Both parents and students report sleep deprivation amongst students in our school district due to

excessive social media use and many students report suffering from physical effects, such as eye strain and headaches, caused by prolonged screen exposure.

9. I have also observed an alarming rise in student anxiety and depression which I believe is tied to social media. Early in my career as a school counselor, it was rare for students to seek help for issues related to social media. However, during the COVID-19 pandemic, students became increasingly reliant on their phones and began using social media as their primary form of communication due to the lack of in-person interaction. Since then, many students have developed the belief that they can say or send virtually anything through these platforms without consequence. This is largely due to features that allow messages and images to disappear after being sent and that notify users when content has been screenshotted. As a result, online interactions have become more impulsive, unfiltered, and at times harmful. Students are often subjected to cyberbullying, exclusion, and constant social comparison, all of which significantly impact their mental health..

10. Ultimately, there are numerous negative effects of social media on the students I and other counselors in our school district serve. These effects include, but are not limited to, excessive use of social media which impacts student's mental health, emotional wellbeing as described above, and performance in school, mental health deterioration caused by students' use of social media, students use of fake social media accounts which expose children to dangerous situations on social media, and/or bullying and harassment that occurs on social media platforms and spills over into the school environment.

11. Importantly, I have observed that the impacts of social media on students' wellbeing are unique to social media use. For instance, I have observed that many students experience negative mental health impacts directly tied to their use of social media, such as

feeling overwhelmed, anxious, and inadequate after spending time on social media. The 24/7 nature of these platforms means students rarely get a break from the pressures of maintaining an online presence, leading to chronic stress and emotional exhaustion. Over time, this has contributed to a noticeable increase in the number of students experiencing higher levels of anxiety and depression.

12. Similarly, bullying and harassment that occurs on social media platforms exacerbate the issues we counselors must address, as the bullying and harassment are disseminated further and for longer periods of time than they would be absent a social media platform and social media emboldens students to engage in this type of behavior that does not occur when interacting in person.

13. We have seen a troubling increase in the number of Instagram pages targeting students at Breathitt High School and within Breathitt County Schools. Accounts such as *bhs\_bops\_2.0*, *breathitt\_couples101*, *bhs.pretty.people*, *bhs\_hotties*, *gyatt*, *breathitt\_cheaters*, *bhsdramma.22*, *bhs\_tea20*, *bhs.fatties14*, *bhs\_big\_backs*, *breathittsleepers*, *bhsfags2025*, *bhs\_bhsyoushouldknow*, and *breathitt.baddies* have been reported by numerous students. These pages frequently post photos and videos of our student population, often accompanied by captions that range from seemingly harmless to explicitly harmful. In many cases, students have been photographed without their knowledge or consent, often featuring specific body parts or private moments that are then shared publicly. Some of these pages are entirely devoted to sharing videos of fights that have taken place on campus, while others exist to spread rumors, humiliate, or slander students. The psychological toll this takes on our student body is significant, fostering fear, anxiety, embarrassment, and in some cases, long-term damage to self-esteem and peer relationships.



14. What has been especially frustrating is how difficult it is to have these pages removed. Despite being reported repeatedly for harassment, bullying, or even for targeting individuals under the age of 13, many of these accounts remain active for extended periods. Even when large numbers of students, staff, and parents submit reports, the response from platform moderators is often slow or ineffective. The burden of removing harmful content falls unfairly on those being victimized.

15. The introduction of TikTok challenges has also contributed to a noticeable increase in the destruction of school property, particularly in our restrooms. These viral trends often encourage students to participate in reckless behaviors such as pulling sinks off walls, intentionally flooding toilets, or damaging paper towel dispensers. Unfortunately, some of our students have followed these trends, resulting in significant damage. These acts have not only drained valuable school resources but have also forced us, at times, to temporarily close restrooms for repairs. This creates an inconvenience for our entire student body and punishes those who have no involvement in the behavior. The influence of these challenges highlights the powerful and often negative impact of social media on student decision-making and school culture.

16. These numerous negative effects of social media on students causes many issues that I must address as a counselor. For example, if a student now has mental health issues because of their social media use I need to assist in navigating and addressing these mental health concerns. Similarly, if students are using social media to bully other students I have to address and mediate these incidents. Moreover, excessive student social media use leads to negative academic performance that I also must address with students.

17. The time that I have to spend on social media related impacts on students has substantially increased in the nearly nine years that I have worked as a counselor at Breathitt High School.

18. When I first started as a counselor in **July 2017**, approximately 15% of my work time with students was spent on social media related concerns. By 2020, that number had risen to around 40%. Now in 2025, I spend anywhere from 75 – 80% of my work time addressing social media issues.

19. Because the majority of my day is now spent on addressing social media impacts on students, this means I have less time to dedicate to other aspects of my job such. In addition to being the school counselor, I serve in multiple capacities: CTE Coordinator, Perkins and GMAP Coordinator, End-of-Program Assessment Coordinator, Dual Credit and Scholarship Coordinator, SEL/Mental Health Coordinator, and 504 Coordinator. I am also responsible for all facets of student scheduling, including creating the master schedule, individual student schedules, and processing schedule changes. Unfortunately, the constant need for intervention due to social media-related issues has limited my availability to assist seniors with scholarships, FAFSA, and career planning. I am also struggling to dedicate adequate time to providing 504 accommodations and ensuring plans are reviewed and updated annually, instead of on a three-year cycle. Students who come to me simply needing a space to decompress or receive emotional support are often interrupted by the steady stream of students in crisis, often tied to social media conflicts involving multiple individuals and complex dynamics. I lead several restorative groups each week in an effort to resolve these issues. These sessions typically involve helping students work through social media-related disputes and encouraging them to either rebuild relationships or at least maintain civility during the school day. In just the past three weeks, I have not been

able to complete senior scheduling for the next academic year due to the volume of social media interventions required. Additionally, I've had to work after hours to complete our Perkins grant for the upcoming school year. At the heart of my job is caring for my students. That means addressing all of their needs, but most importantly, supporting their mental health and social-emotional well-being. Social media has not only increased my workload, but it has also made it more difficult to use traditional therapeutic strategies effectively. The ongoing, real-time nature of social media use and the students' increasing dependency, if not outright addiction to it, has added a layer of complexity to every aspect of my work.

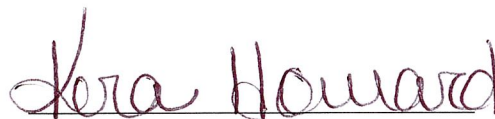
20. Moreover, while having additional counselors would be helpful in addressing the negative impacts that the rising use of social media has had on students, the Breathitt School District has not been able to increase counselor hiring commiserate with the needs of the student population that has been negatively impacted by social media due to funding constraints.

21. I regularly interact with other counselors for children in grades 6 – 12 within the Breathitt School District. Based on these interactions, it is my understanding that my experience is representative and that other counselors also spend the majority of their days addressing social media related concerns and that the amount of time counselors have had to spend on social media related concerns has increased substantially over the last several years.

22. I am the only counselor in my district who was employed in 2017. The other counselors in my district were added around 2021 and they have reported to me that in or around 2021, approximately 40% of their time with students was spent on social media related concerns and that now in 2025 they spend anywhere from 65 – 75% of their work time addressing social media issues.

I declare under penalty of perjury that the foregoing is true and correct. Executed on

May 9, 2025.

A handwritten signature in dark ink, reading "Kera Howard". The signature is written in a cursive style with a horizontal line underneath the text.

Kera Howard